

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois,

Plaintiff,

v.

3M COMPANY, E.I DU PONT DE NEMOURS AND COMPANY; THE CHEMOURS COMPANY FC LLC f/k/a The Chemours Company; DUPONT DE NEMOURS, INC.; DOWDUPONT, INC.; CORTEVA, INC.; CHEMGUARD, INC.; TYCO FIRE PRODUCTS LP; BUCKEYE FIRE EQUIPMENT COMPANY; KIDDE-FENWAL, INC.; NATIONAL FOAM, INC.; ARKEMA, INC.; AGC CHEMICALS AMERICAS, INC.; DYNAX CORPORATION; CLARIANT CORPORATION; UTC FIRE & SECURITY AMERICAS CORPORATION, INC.; CARRIER GLOBAL CORPORATION, INC.; ARCHROMA US, INC.; AMEREX CORPORATION; HONEYWELL INTERNATIONAL, INC.; KIDDE PLC, INC.; RAYTHEON TECHNOLOGIES CORPORATION; CHEMDESIGN PRODUCTS, INC.; DEEPWATER CHEMICALS, INC.; ANGUS FIRE ARMOUR CORPORATION; ROYAL CHEMICAL COMPANY; FIRE SERVICES PLUS, INC.; NATION FORD CHEMICAL COMPANY; CHUBB FIRE LTD; DAIKIN AMERICA, INC., DYNEON, LLC; MINE SAETY APPLIANCES COMPANY, LLC; PERIMETER SOLUTIONS, LP; VERDE ENVIRONMENTAL, INC.; and HONEYWELL SAFETY PRODUCTS US, INC.,

Defendants.

Civil Action No. 1:23-cv-02620

Hon. Sara L. Ellis

**JOINT AGREED MOTION TO DEFER STATUS CONFERENCE SCHEDULED FOR  
JULY 5, 2023 UNTIL AFTER THE JUDICIAL PANEL ON MULTIDISTRICT  
LITIGATION ISSUES ITS FINAL TRANSFER**

Plaintiff People of the State of Illinois (“Plaintiff”) and Defendant 3M Company (“3M”), by and through their undersigned counsel, hereby jointly move the Court to defer the status conference currently scheduled for July 5, 2023 until after the Judicial Panel on Multidistrict Litigation (“JPML”) issues its final transfer decision for the case. In support, Plaintiff and 3M state as follows:

1. Plaintiff filed this action on April 5, 2023 in the Circuit Court of Cook County, Illinois. 3M removed the case to federal court on April 26, 2023. Dkt. 1. To date, 3M is the only Defendant that has entered an appearance in the case.

2. On April 26, 2023, 3M filed a Notice of Potential Tag-Along Action with the JPML, seeking transfer of this action to the *In re Aqueous Film-Forming Foams Products Liability* multidistrict litigation (“AFFF MDL”) currently pending in the District of South Carolina. On May 2, 2023, the Clerk of the JPML entered a Conditional Transfer Order (CTO-131). *See* Conditional Transfer Order (CTO-131), MDL No. 2873 (J.P.M.L.), ECF No. 1888. Plaintiff has filed a motion with the JPML to vacate the CTO. That motion has now been fully briefed and the JPML is expected to render its final transfer decision approximately one to two weeks after its July 27, 2023 hearing session, when it is scheduled to take up this matter. *See* Hearing Session Order, MDL No. 2873 (J.P.M.L.), ECF No. 1947.

3. In light of the requested transfer to the JPML, the parties have agreed that it would be in the interest of judicial economy and efficiency to defer the status conference now set for July 5, 2023 until after the JPML renders its final transfer decision following its July 27, 2023 hearing session.

4. Accordingly, Plaintiff and 3M jointly request the Court to continue the status conference now set for July 5, 2023, pending the JPML's final transfer decision.

Dated: June 29, 2023

Respectfully submitted,

/s/ Daniel R. Flynn \_\_\_\_\_

One of Plaintiff's attorneys

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*Counsel for Plaintiff People of the State of  
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*\*pro hac vice* motions to be submitted

**CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 2023, I caused a copy of the foregoing to be filed and served electronically via the CM/ECF system.

/s/ Daniel L. Ring  
Daniel L. Ring